

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**

**DAVID OPPENHEIMER,**  
**Plaintiff,**

**v.**

**HADDEN R. HIPPSLEY;**  
**LAMBDA TOURS, INC., d/b/a**  
**LAMBDA PRODUCTIONS**  
**Defendants.**

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**CA No. 1:20-CV-00570-PAG**

**JUDGE PATRICIA A.  
GAUGHAN**

**NOTICE OF STIPULATED DISMISSAL AND PERMANENT INJUNCTION**

Pursuant to Rule 41 of the Federal Rules of Civil Procedure, Plaintiff David Oppenheimer (“Oppenheimer” or “Plaintiff”) and Defendants, Hadden R. Hipsley (“Hipsley”), Lambda Tours, Inc. d/b/a Lambda Productions (“Lambda”) (together, “Defendants”), by and through the undersigned counsel, stipulate and agree to the dismissal with prejudice of all claims asserted in the above-captioned action, with each party to bear its own attorneys’ fees and costs.

The parties also request that the Court enter the stipulated permanent injunction against the Defendants, as follows:

1. Defendants Hipsley and Lambda are hereafter enjoined from copying, distributing, displaying, publishing, creating derivative works, or in any way using in commerce or otherwise, the Photograph attached to Plaintiff’s Complaint as Exhibit 1 [ECF No. 1-2].
2. This Court shall retain jurisdiction of this case and over the parties for the purposes of enforcing this Consent Order.

SO ORDERED, this the 5<sup>th</sup> day of August 2020

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**PATRICIA A. GAUGHAN**  
**UNITED STATES DISTRICT COURT**  
**CHIEF JUDGE**

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